

REMARKS

Claims 1-8 and 10-34 are pending. Reconsideration and allowance of the pending claims is respectfully requested.

§ 102(e) Rejection

Claims 1-8 and 10-34 stand rejected under 35 U.S.C. § 102(e) as being unpatentable over U.S. Patent No. 6,643,652 to Helgeson et al. (hereinafter "Helgeson"). The Applicants respectfully disagree.

Claim 1 is directed to a server system. Claim 1 recites in part:

- a business logic layer to process the client requests according to a particular business domain and produce replies to be returned to the clients in response to the client requests;
- a presentation layer separate from, but in communication with, the business logic layer to structure the replies in a manner that makes the replies presentable on different types of client devices according to a tag library containing pre-constructed tags for a variety of data formats;
- a request dispatcher to structure a reply for service back to a client device, the request dispatcher being configured to access the tag library to obtain tags to structure the reply according to a particular data format.

The Office asserts Helgeson as disclose the recited features of Claim 1. However, Helgeson fails to disclose a business logic layer to process the client requests according to a particular business domain and produce replies to be returned to the clients in response to the client requests. Rather, Helgeson merely teaches a translation method in which communications are translated between a local format and a generic format. *Helgeson, Abstract*. Additionally, Helgeson does not include a business logic layer which, in part, produces "replies to be returned to the clients in response to the client requests." Instead, the common

business objects layer 505 of Helgeson, asserted to be the business logic layer, is a module that merely defines a set of business objects shared across all SABA applications. Helgeson, Col. 5, line 66-Col. 6, line 2.

Helgeson also fails disclose a system implementing “a tag library containing pre-constructed tags for a variety of data formats.” Instead, Helgeson teaches a method which translates a local format into a generic interchange format and back to a local format. *Helgeson, Abstract*. The Helgeson system implements predefined “stylesheets” using generic components and system specific service components. *Helgeson, Abstract*. The Helgeson stylesheets are maps between system specific local format and a generic interchange format. *Helgeson, Col. 2, lines 52-55*. Additionally, the Helgeson system requires a stylesheet for each system specific local format. In this manner, the Helgeson system only permits communication with a device having a predefined map or stylesheet to permit conversion between the local system specific format and the generic format and prevents adaptation to various device formats and protocols. The Helgeson system does not disclose “a tag library containing pre-constructed tags for a variety of data formats” as recited in the claim. Rather, in each instance, the Helgeson reference requires a stylesheet which entirely maps the local format. Therefore, this also fails to teach a library containing pre-constructed tags for a variety of data formats. Instead, the Helgeson stylesheet merely defines a single local format.

The Office incorrectly recited Helgeson, Col. 51, lines 65-57, discussing a “model file”, as teaching “a presentation layer separate from, but in communication with, the business logic layer to structure the replies in a manner that makes the replies presentable on different types of client devices according to

a tag library containing pre-constructed tags for a variety of data formats.” The Helgeson model file contains the data for display. *Helgeson, Col. 52, line 5. See also Helgeson, Col. 50, lines 7-8.* The Helgeson teaching is in contradiction to Claim 1 which recites “a business logic layer to process the client requests” and “a presentation layer separate from, but in communication with, the business layer . . . that makes the replies presentable on different types of client devices.”

The Action recites the same portions of Helgeson, describing a model file, as teaching “a request dispatcher to structure a reply for service back to a client device, the request dispatcher being configured to access the tag library to obtain tags to structure the reply according to a particular data format.” This is incorrect. Neither the cited portions of Helgeson, nor anywhere does Helgeson disclose the recited feature. The cited portions of Helgeson teach implementing a control file which identifies a model file containing data and user operations used by the application. *Helgeson, Col. 50, lines 7-8.* This fails to permit structuring “a reply for service back to a client device . . . the reply according to a particular data format” as the data and user operations in Helgeson are coupled in the model file. For at least these reasons, Claim 1 is not anticipated by Helgeson and the pending rejection should be removed.

Claim 12 is allowable as Helgeson does not teach “a presentation component to construct how a reply will appear through use of a tag library containing pre-constructed tags for a variety of data formats.” The Helgeson references teaches a method which translates a local format into a generic interchange format and back the Helgeson system implements predefined “stylesheets” using generic components and system specific service components.

Helgeson, Abstract. The Helgeson stylesheets define a single local format and do not teach “a presentation component to construct how a reply will appear through use of a tag library containing pre-constructed tags for a variety of data formats.” Removal of the pending rejection is respectfully requested for at least the above reason.

Claim 2 is allowable based on its dependency from Claim 1. Additionally, Claim 2 is allowable as the common business objects layer 505 of Helgeson fails to permit reconfiguration “to other business domains by substituting other business logic layers that are designed to process the client requests according to the other business domains.” The common business object layer of Helgeson is only implemented to define a set of business objects and fails to “process the client requests according to the other business domains.” *Helgeson, Col. 5, line 66-Col. 6, line 2*. “These (business) objects may be either generic business concepts, such as a Party, or shared concepts specific to Saba’s application domain, such as Calendar.” *Helgeson, Col. 8, lines 4-8*. Accordingly, Applicants respectfully request the pending rejection be withdrawn.

Claims 3 and 13 depend, respectively, from Claims 1 and 12 and are allowable for at least the same reasons. Additionally, Claims 3 and 13 are allowable as the model file, asserted to be the presentation layer in Claim 1, fails to determine the layout of content in the replies. Instead, the model file includes the data for the client. *Helgeson, Col 52, line 5*. Accordingly, Applicants respectfully request that the §102(e) rejection of Claims 3 and 13 be withdrawn.

Claims 4 and 14 depend, respectively, from Claims 1 and 12 and are allowable based on the same rationale as their respective independent claims.

Additionally, the claims at issue are allowable as the model file, asserted to be the “presentation layer” of Claim 4, includes data and does not “determine display attributes in the replies.” See *Helgeson*, Col. 51, lines 20-52. Accordingly, Applicants respectfully request the pending rejection be withdrawn.

Claims 5 and 15 are allowable based on their respective dependency from Claims 1 and 12. The Office’s position that the model file, asserted to be the presentation layer, is “. . . configured to select appropriate data formats for encoding the replies” is incorrect. The Helgeson model file operates as the intermediate generic file for transmission of the raw data and does not select the data format “for encoding the reply.” *Helgeson*, Col. 51, lines 15-18. Instead, the model file is the generic communication transmission of the data.

Claims 6 and 16, individually, depend from Claims 1 and 12 and are allowable for at least the same reasons. Additionally, the instant claims are allowable as the Helgeson model file fails to select an “appropriate communication protocol for delivering the reply to the particular client” as recited in Claim 16. Instead, the control file identifies the model file which includes the data. *Helgeson*, Col. 51, lines 55-60. The cited Helgeson passage, Col. 11, lines 39-67, fails to disclose client replies. Rather, the cited portion of Helgeson merely describes intra server communication and does not select “appropriate communication protocol for delivering the reply to the particular client”. Accordingly, Applicants respectfully request that the §102(e) rejection to Claims 6 and 16 be withdrawn.

Claims 7 and 26 are allowable based on their dependency from Claims 1 and 24 (discussed below) respectively. Additionally, Claims 7 and 26 are allowable for based on the individual claim’s own recited features which are not disclosed by

Helgeson. Accordingly, Applicants respectfully request that the §102(e) rejection to the claims withdrawn.

Claim 8 depends from Claim 1 and is allowable for at least the same reasons. Neither the cited portions of Helgeson, nor anywhere does Helgeson teach or disclose in part:

- a presentation tier to determine how the replies will appear on the client devices to users;
- a rendering tier, separate from the presentation tier, to determine how to render the replies on the client devices.

The cited portions of Helgeson fail to disclose a presentation layer in which a rendering tier determines “how to render the replies on the client devices.” The Helgeson passages do not teach a presentation layer having these features. The Helgeson Col. 51 passage merely teaches a control file identifying a model file and view file. The model file, previously asserted to be the “presentation layer” does not include tiers as described. Removal of the pending rejection is respectfully requested for at least the above reasons.

Claims 10 and 25 are allowable for at least the same reasons as discussed with respect to each claim’s base independent claim. With particular respect to Claim 10, the cited Helgeson passage merely describes server intra communication and not “serving the reply back to the client device.” The Helgeson control file, as discussed with respect to Claim 1, does not select the communication protocol as this is accomplished by the stylesheet or map. Instead, the control file just identifies the model and view files and does not serve “the reply back to the client device.” Removal of the pending rejection is respectfully requested for at least the above reasons.

Claim 11 depends from Claim 1 and is allowable for at least the same reasons. Additionally, Claim 11 is allowable for its own recited features which are not disclosed by Helgeson. Accordingly, Applicants respectfully request that the §102(e) rejection of Claim 11 be withdrawn.

Claim 17 depends from Claim 12 and is allowable for at least the same reasons. Additionally, Claim 17 is allowable as nowhere does Helgeson teach a “rendering component is configured to conform the reply to a specific display at the particular client.” As Helgeson simply teaches utilizing “stylesheets” the ability of Helgeson to conform a reply is limited to the available stylesheets and does not conform a reply. Accordingly, Applicants respectfully request that the §102(e) rejection of Claim 17 be withdrawn.

Independent **Claim 18** is separately patentable and recites features differing from Claims 1 and 5. Claim 18 in part recites computer software architecture including:

- a presentation tier to determine how data for communication to a client device is to be presented on the client device through use of a tag library containing pre-constructed tags for a variety of data formats; and
- a rendering tier, separate from the presentation tier, to determine how to render the data on the client device

Nowhere does Helgeson teach or disclose software architecture having a tiered structure as recited. The Helgeson system implements a limited variety stylesheets which are utilized for translation between local and generic formats. The Helgeson system does not disclose “a tag library containing pre-constructed tags for a variety of data formats.” In each instance, the Helgeson reference requires a stylesheet which entirely defines the local format. This fails to teach a library containing pre-constructed tags for a variety of data formats. Instead, the

Helgeson stylesheet merely defines a single local format. Accordingly, Applicants respectfully request that the §102(c) rejection of Claim 18 be withdrawn for at least the reasons discussed above.

Claims 19 and 30 are allowable for at least the same reasons as discussed with respect to each claim's base independent claim. Claim 27, from which Claim 30 depends, is discussed below. Additionally, Claims 19 and 30 are allowable on each claim's own recited features which are not disclosed, by Helgeson. Accordingly, removal of the pending rejection is respectfully requested.

Claims 20, 28 and 29 are allowable based on their respective dependency from Claims 18 and 27. Neither the cited passage of Helgeson, nor anywhere does Helgeson disclose "the presentation tier is configured to select a data encoding format for encoding the data and a communications protocol in which to send the data to the client device." The Helgeson passage Col. 57 lines 47-48 simply discloses a control file which identifies a model file and a view file. Helgeson does not teach software architecture including a presentation tier "configured to select a data encoding format for encoding the data and a communications protocol in which to send the data to the client device", with particular respect to Claim 20. The Helgeson reference implements stylesheets for the translation of data from a local format to a generic format. Neither the model file, nor the control file determine a data encoding format as this information is a fixed map or stylesheet utilized to permit translation between the local and generic formats. *Helgeson, Col. 2, lines 52-55*. Accordingly, removal of the pending rejection is respectfully requested.

Claims 21 and 22 depend from Claim 18 and are allowable for at least the same reasons. Additionally, Claims 21 and 22 are allowable based on each claim's own recited features which are not disclosed by Helgeson. Accordingly, Applicants respectfully request that the §102(e) rejection of Claim 21 and 22 be withdrawn.

Claim 23 is allowable based on its dependency from Claim 18. The Helgeson reference does not teach a tag library, or a request dispatcher. The Helgeson system implements a scheme utilizing a control file having an associated stylesheet. Helgeson associates the translation between the local format and the generic format utilizing this stylesheet or map. In this manner, there is no need for any tags as recited because the stylesheet is implemented in all cases and provides a complete local-to-generic map. The control file merely is implemented to identify the model file for loading of data. *Helgeson, Col. 51, lines 64-65.*

Independent **Claim 24** stands rejected over Helgeson. Applicants respectfully disagree. Claim 24 is separately patentable and recites features differing from Claim 1. Claim 24, in part, recites:

- a tag library containing pre-constructed tags for a variety of data formats;
- multiple request dispatchers to structure replies to be returned to client devices in response to requests submitted by the client devices, individual request dispatcher formatting data according to particular formats that are supported by the client devices according to the tag library;

Helgeson does not teach "a tag library containing pre-constructed tags for a variety of data formats." The Helgeson system does not include a tag library containing pre-constructed tags for a variety of data formats. As discussed previously, the Helgeson reference merely implements a predefined stylesheet to facilitate local format to generic format interpretation. *Helgeson, Abstract.* As the stylesheet

provides a map for the translation there is no need for a tag library as suggested by the Office. Additionally, since any conversion in the Helgeson reference utilizes a stylesheet there no need for “. . . individual request dispatchers formatting data according to particular formats that are supported by the client devices according to the tag library.” In the Helgeson system, the control file simply includes information associated with the model file to permit loading. The citation of Helgeson Col. 11 merely discloses intra server communication and does not “structure replies to be returned to the client.” Accordingly, Applicants respectfully request that the §102(e) rejection of Claim 24 be withdrawn.

Independent **Claim 27** is separately patentable from Claims 1 and 24. Claim 27 includes features differing from those recited in either Claim 1 or 24. Applicants disagree with the pending rejection to Claim 27. Claim 27 is directed to a method including in part the steps of:

- structuring the reply to define how the reply will appear when communicated to and presented at the client through use of a tag library containing pre-constructed tags for a variety of data formats;

Helgeson fails to utilize a tag library containing pre-constructed tags for a variety of data formats. The Helgeson system implements a stylesheet which includes data to permit conversion between a local format and a generic format. As the stylesheet includes all the mapping for a local format to generic format translation there is no need to include a library “containing pre-constructed tags for a variety of data formats” as asserted by the Office because all the necessary information is included in the stylesheet. Accordingly, Applicants respectfully request that the §102(e) rejection of Claim 27 be withdrawn.

Claim 31 depends from Claim 27 and is allowable for at least the same reasons. Additionally, Claim 31 is allowable for its own recited features which are not disclosed by Helgeson. Accordingly, Applicants respectfully request that the §102(e) rejection of Claim 31 be withdrawn.

Claim 32 is allowable as neither the cited portions of Helgeson, nor anywhere does the reference teach or disclose sizing the reply for display at the client. Helgeson is a transform system that lacks the utilization of a tag library which utilized in structuring (Claim 27 from which Claim 32 depends). Helgeson fails to teach the independent “conforming the reply to output capabilities of the client” (Claim 27) or “sizing the reply for a display at the client” (Claim 32). The Helgeson passages simply disclose a control file, model file, and view file methodology by which information in the control file is implemented to load the model file and subsequently modified with the view file. *Helgeson, Col. 51, line 55 through Col. 52, line 13*. Accordingly, removal of the pending rejection is respectfully requested.

Independent **Claim 33** recites computer-readable media. Claim 33 includes differing features than those recited in Claims 1 and 8 which are generally directed to a server system. Applicants disagree with the pending rejection to Claim 33. Claim 33 in part recites:

- generate replies in response to client requests through use of a tag library containing pre-constructed tags for a variety of data formats, the client requests being submitted by diverse client devices that support different data formats and different communication protocols;

Helgeson fails to disclose the above features and therefore fails to anticipate Claim 33. The Helgeson system and methodology does not employ pre-constructed tags nor does the Helgeson reference utilize a tag library. The Helgeson system does

not teach either of these features as a stylesheet, which entirely maps the local-to-generic conversion, is implemented in the transformation. Due to the utilization of stylesheets there is no need to maintain a tag library as the Helgeson identifies the conversion with the associated stylesheet. Accordingly, removal of the pending rejection is respectfully requested.

Claim 34 depends from Claim 33 and is allowable for at least the same reasons. Additionally, Claim 34 is allowable for its own recited features which are not disclosed by Helgeson. Accordingly, Applicants respectfully request that the §102(e) rejection of Claim 34 be withdrawn.

Respectfully Submitted,

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